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Via ECF

The Honorable Pamela K. Chen, U.S.D.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Arevalo Fajardo et al v. WB Maintenance & Design Group Inc. et al*
Case No.: 1:21-cv-05236-PKC-SJB

Dear Honorable Judge Chen:

This law firm represents Plaintiffs Byron Geovanny Arevalo Fajardo (“Fajardo”), Carlos Martell (“Martell”), Jose Gutierrez (“Gutierrez”), Juan Pereyra (“Pereyra”), Iñigo Mendoza Ramirez (a/k/a Eduardo Mendoza Ramirez) (“Ramirez”), Miguel Garrido (“Garrido”), Reymundo Chavez Hernandez (a/k/a Ramon Chavez Hernandez) (“Chavez Hernandez”), Richard Xavier Hernandez (“Xavier Hernandez”), Sebastian Alfredo Espinosa Vargas (a/k/a Sebby Espinosa Vargas) (“Vargas”), Jairo Rivas (“Rivas”), Elias Ordones (“Ordones”), and George Palta (“Palta”, and collectively, the “Plaintiffs”) in the above-referenced matter.

Pursuant to Rule 1(G) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to an extension of the parties’ deadline to comply with your Honor’s June 15, 2023 Order from July 14, 2023 to, through and including, August 15, 2023. The instant request is made on consent of counsel for Defendants W.B. Maintenance & Design Group Inc., W.B. & Son Construction Corp., Vladimir Briceno, Betty Briceno, Jeissy Briceno, and Jeimy Briceno (collectively “the Briceno Defendants”).

The basis of the request is that the necessary parties need additional time to finalize the terms of the disposition of this action, as well as the parallel bankruptcy proceedings.¹

The Court should respectfully be aware that there is a confirmation hearing scheduled in the consolidated bankruptcy proceeding captioned *In re WB Maintenance Inc.*, Case No.: 1-22-41755-JMM on July 17, 2023 at 10:00 a.m.

In light of the foregoing, Plaintiffs respectfully request that the Court extend the parties’ deadline to comply with your Honor’s June 15, 2023 Order from July 14, 2023 to, through and including, August 15, 2023.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

¹ To wit: *WB Maintenance Inc.*, Case No.: 1-22-41755-JMM; *Go-Pro Maintenance Inc.*, Case No.: 1-22-41756-JMM; *W.B. Maintenance & Repair Corp.*, Case No.: 1-22-41757-JMM. *W.B. & Son Construction Corp.*, Case No.: 1-22-41758-JMM; and *WB Maintenance & Design Group Inc.*, Case No.: 1-22-41759-JMM. On August 5, 2022, The Honorable United States Bankruptcy Judge Jil Mazer-Marino, entered an Order, directing the joint administration of the Debtors’ Chapter 11 cases under Case No.: 1-22-41755-JMM.

Respectfully submitted,
LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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